

William E. Peterson (Bar No. 1538)  
 Nathan G. Kanute (Bar No. 12413)  
 SNELL & WILMER L.L.P.  
 50 West Liberty Street, Suite 510  
 Reno, Nevada 89501  
 Telephone: 775.785.5440  
 Facsimile: 775.785.5441  
 Email: wpeterson@swlaw.com  
 nkanute@swlaw.com

*Attorneys for Respondent*

UNITED STATES DISTRICT COURT  
 DISTRICT OF NEVADA

STEPHEN BRAHMS, individually and on  
behalf of all others similarly situated,

Movant,

vs.

PAMELA KLESSIG,

Respondent.

Case No. 3:23-cv-00083-ART-CSD  
 (Related to Civil Action 1:20-cv-  
 04953 (S.D.N.Y.))

**STIPULATION AND ORDER  
 EXTENDING DEADLINE FOR  
 RESPONSE TO MOTION TO COMPEL  
 (FIRST REQUEST)**

Respondent, Pamela Klessig (“Respondent”), and Movant, Stephen Brahms (“Movant”,  
 collectively with Respondent, the “Parties”) stipulate to extend the deadline for Respondent to  
 respond to Movant’s motion to compel through May 15, 2023. The Parties make the following  
 stipulation for good cause, not for the purpose of delay, and for the following reasons:

1. Movant filed his *Motion to Compel Non-Party Pamela Klessig’s Compliance with Subpoena* (the “Motion”) on February 27, 2023.
2. Respondent accepted service of the Motion on March 24, 2023.
3. Respondent served her responses and objections to Movant’s subpoena of documents on April 7, 2023.
4. Movant’s counsel is in the process of reviewing the responses and objections and the Parties have agreed to continue to discuss the potential resolution of the Motion.
5. The Parties need additional time to continue those discussions.

Snell & Wilmer  
LLP  
LAW OFFICES  
50 West Liberty Street, Suite 510  
Reno, Nevada 89501  
775.785.5440

- 1           6.       The response to the Motion is currently due on April 14, 2023.
- 2           7.       The Parties have agreed to extend the time to file the response through May 15,
- 3       2023.
- 4           8.       This stipulation is made in good faith and not for the purposes of delay.
- 5           Therefore, the Parties request that the Court grant the extension of the time to respond to
- 6       the Motion through May 15, 2023.

7       DATED this 12 <sup>th</sup> day of April, 2023.	DATED this 12th day of April, 2023.
8	SNELL & WILMER L.L.P.
9 <u>/s/Patrick R. Leverty (with permission)</u>	<u>/s/Nathan G. Kanute</u>
10      Patrick R. Leverty (NV Bar No. 8840)	William E. Peterson (NV Bar No. 1528)
11      Leverty & Associates Law, Chtd.	Nathan G. Kanute (NV Bar No. 12413)
12      832 Willow Street	50 W. Liberty Street, Suite 510
13      Reno, Nevada 89502	Reno, Nevada 89501
14      Phone: (775) 322-6636	Phone: (775) 785-5440
15      Andrea Farah ( <i>Pro hac vice</i> )	
16      LOWEY DANNENBERG, P.C.	<i>Attorneys for Respondent Pamela Klessig</i>
17      44 South Broadway, Suite 1100	
18      White Plains, New York 10601	
19      Phone: (914) 997-0035	
20 <i>Attorneys for Movant Stephen Brahms</i>	

**ORDER**

21           Good cause appearing, IT IS HEREBY ORDERED that the Parties' stipulation is

22       GRANTED. The response to Movant's Motion to Compel Non-Party Pamela Klessig's

23       Compliance with Subpoena shall be due on May 15, 2023.

**IT IS SO ORDERED.**

DATED: April 13, 2023.

  
UNITED STATES MAGISTRATE JUDGE